

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

One-Time Informational Reports on)	Docket Nos. RM22-16-000
Extreme Weather Vulnerability)	AD21-13-000
Assessments)	
)	
Climate Change, Extreme Weather, and)	
Electric System Reliability		

**JOINT COMMENTS OF THE NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION AND THE REGIONAL ENTITIES IN RESPONSE TO NOTICE OF
PROPOSED RULEMAKING**

The North American Electric Reliability Corporation (“NERC”) and the six Regional Entities,¹ collectively the “Electric Reliability Organization (“ERO”) Enterprise,” submit comments on the Federal Energy Regulatory Commission (“FERC” or “Commission”) Notice of Proposed Rulemaking (“NOPR”) proposing to direct public utility transmission providers to submit one-time informational reports describing their current or planned policies and processes for conducting extreme weather vulnerability assessments pursuant to the Commission’s authority under Section 304 of the Federal Power Act.²

As discussed in these comments, the ERO Enterprise appreciates the Commission’s attention to addressing the impacts of extreme weather conditions on the nation’s electric grid, particularly the impacts on reliability. The ERO Enterprise believes the proposed one-time informational reports would improve transparency regarding current extreme weather planning

¹ NERC was certified by the Commission as the Electric Reliability Organization, pursuant to Section 215(c) of the Federal Power Act, by Commission order issued July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006). The six Regional Entities with delegated authority pursuant to Section 215(e)(4) of the Federal Power Act include the following: Midwest Reliability Organization, Northeast Power Coordinating Council, Inc., ReliabilityFirst Corporation, SERC Reliability Corporation, Texas Reliability Entity, Inc., and Western Electricity Coordinating Council.

² *One-Time Informational Reports on Extreme Weather Vulnerability Assessments Climate Change, Extreme Weather, and Electric System Reliability*, Notice of Proposed Rulemaking, 179 FERC ¶ 61,196 (2022) [hereinafter NOPR].

practices, and would thereby aid both the Commission and the ERO Enterprise in executing their statutory responsibilities regarding reliability under Section 215 of the Federal Power Act. The ERO Enterprise therefore supports the Commission's proposal and offers these comments for the Commission's consideration.

I. NOTICES AND COMMUNIATIONS

Notices and communications with respect to this filing may be addressed to the following:³

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³ Persons to be included on the Commission's service list are identified below by an asterisk. NERC respectfully requests a waiver of Rule 203 of the Commission's regulations, 18 C.F.R. § 385.203 (2022), to allow the inclusion of more than two persons on the service list in this proceeding.

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II. SUMMARY OF THE NOPR

In the NOPR, the Commission proposes to require transmission providers, to mean any public utility that owns, controls, or operates facilities used for the transmission of electric energy in interstate commerce, to submit one-time informational filings addressing their processes and procedures for conducting extreme weather vulnerability assessments.⁴ The Commission proposes to define “extreme weather vulnerability assessments” for the purposes of this NOPR as “analyses that identify where and under what conditions jurisdictional transmission assets and operations are

⁴ NOPR at PP 1, 19 and n.1.

at risk from the impacts of extreme weather events, how those risks will manifest themselves, and what the consequences will be for system operations.”⁵

The Commission further proposes that the required reports address a number of factors related to extreme weather vulnerability assessments, including: (1) how scope is established; (2) how inputs are developed; (3) how vulnerabilities and exposure to extreme weather hazards are identified; (4) how costs of impacts are estimated; and (5) how mitigation measures are developed.⁶

III. ERO ENTERPRISE COMMENTS

The ERO Enterprise supports the Commission’s proposal to direct the submission of one-time informational filings regarding current or planned processes and procedures for conducting extreme weather vulnerability assessments. Extreme weather events, particularly extreme heat and cold conditions, have threatened the reliability of the electric grid multiple times over the past decade. Further, the grid continues to transform to one that is more vulnerable to the effects of extreme weather. As the Commission observes in the NOPR, NERC’s reliability assessments have identified heightened risks to reliability, in both the short and long-term, due to extreme weather.⁷ The importance of understanding and properly planning for these conditions cannot be understated. The ERO Enterprise has made addressing the risks of extreme weather to the reliability of the grid a high priority, as demonstrated through its recent work on the joint instigation with Commission staff into the causes of the February 2021 cold weather event affecting Texas and the Southwestern United States,⁸ two standard development projects addressing cold weather preparedness and

⁵ *Id.* Summary.

⁶ *Id.* at 23.

⁷ NERC’s Reliability Assessments are available on NERC’s webpage at <https://www.nerc.com/pa/RAPA/ra/Pages/default.aspx>.

⁸ See FERC, NERC, and the Regional Entity Staff Report, *The February 2021 Cold Weather Outages in Texas and the South Central United States* (Nov. 2021), <https://www.ferc.gov/media/february-2021-cold-weatheroutages-texas-and-south-central-united-states-ferc-nerc-and>.

operations,⁹ a 2021 NERC alert regarding cold weather preparedness,¹⁰ the ongoing work of the NERC Energy Reliability Assessment Task Force,¹¹ and other entity efforts. The ERO Enterprise also supports the Commission's June 2022 proposal, in Docket No. RM22-10-000, to direct enhancements to the transmission planning Reliability Standard TPL-001-5.1 to better account for extreme heat and cold conditions in system planning and, where appropriate, require planning entities to develop corrective action plans to mitigate the reliability impacts of such conditions.¹²

Recognizing the importance of appropriate planning for such conditions, the ERO Enterprise supports the Commission's proposal to direct transmission providers to submit one-time informational filings regarding their current or planned processes or procedures for conducting extreme weather vulnerability assessments. The ERO Enterprise agrees that it is important to understand how entities are (or are not) currently evaluating and preparing for these risks, particularly as it relates to reliability. The ERO Enterprise also agrees that the proposed informational filings would increase transparency into current or planned entity planning practices

⁹ These projects are Project 2019-06 Cold Weather, resulting in the Cold Weather Reliability Standards approved by the Commission in 2021 (see *infra* n. 20), and Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination, initiated to address the recommendations of the FERC, NERC, and the Regional Entity Staff Report, The February 2021 Cold Weather Outages in Texas and the South Central United States (Nov. 2021). More information on Project 2021-07 is available at <https://www.nerc.com/pa/Stand/Pages/Project-2021-07-ExtremeColdWeather.aspx>.

¹⁰ NERC, Recommendation to Industry: Cold Weather Preparedness for Extreme Weather Events (Aug. 18, 2021), <https://www.nerc.com/pa/rrm/bpsa/Alerts%20DL/NERC%20Alert%20R-2021-08-18-01%20Extreme%20Cold%20Weather%20Events.pdf>.

¹¹ More information regarding the Energy Reliability Assessment Task Force is available at <https://www.nerc.com/comm/RSTC/Pages/ERATF.aspx>.

¹² *Transmission System Planning Performance Requirements for Extreme Weather*, Notice of Proposed Rulemaking, 179 FERC ¶ 61,195 (2022). See also *Joint Comments of the North American Electric Reliability Organization and the Regional Entities in Response to Notice of Proposed Rulemaking*, Docket No. RM22-10-000 (Aug. 26, 2022).

NERC observes that the currently effective TPL-001 Reliability Standard, TPL-001-4, requires Transmission Planners and Planning Coordinators to evaluate, as part of extreme event steady state analysis, wide area events affecting the Transmission System, which may include loss of two generating stations resulting from conditions such as wildfires or extreme weather or other events based on operating experience that may result in wide area disturbances. Not all transmission providers are required to perform these studies; only those entities that are registered for the Transmission Planner or Planning Coordinator function are required to perform these studies.

and facilitate enhanced information sharing and coordination, the benefits of which may extend into enhanced system reliability.

While the Commission has proposed to direct these informational reports to aid in its administration of the Federal Power Act,¹³ the proposed informational reports would also aid the ERO Enterprise in carrying out its statutory obligations regarding reliability under Section 215 of the Federal Power Act. For example, such reports may be used to inform NERC Reliability Standards development efforts, such as those proposed by the Commission in Docket No. RM22-10-000, or reliability assessments.¹⁴ The ERO Enterprise understands that the Commission intends for the proposed one-time informational filings to be publicly available,¹⁵ and thus available to the ERO Enterprise for the purposes described above. The ERO Enterprise respectfully requests that, to the extent any of the proposed one-time informational filings are afforded confidential treatment under the Commission's regulations, the pertinent information regarding reliability matters be shared on a confidential basis with the ERO Enterprise.

IV. CONCLUSION

The ERO Enterprise supports the Commission's efforts to strengthen the reliability of the Bulk-Power System by addressing the risks posed by extreme conditions. The ERO Enterprise supports the Commission's proposal to direct one-time informational reports from entities regarding their current or planned practices and procedures for conducting extreme weather vulnerability assessments and appreciates the opportunity to provide comments in this proceeding.

¹³ See, e.g., NOPR at P 18.

¹⁴ See Section 215(g) of the Federal Power Act (codified at 16 U.S.C. ¶ 824o(g)).

¹⁵ See NOPR at P 19, 22.

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